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Attorney for Claimants Marianas Consultancy Services, LLC and Alfred Yue

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

8 UNITED STATES OF AMERICA, ) CASE NO. 1:22-cv-00020  
9 Plaintiff, )  
10 )  
11 vs. )  
12 \$271,087.88 IN U.S. CURRENCY SEIZED ) STIPULATED MO  
13 FROM BANK OF SAIPAN ACCOUNT NO. ) TO CONTINUE DE  
14 ENDING IN LAST FOUR DIGITS 0157, ) FOR CLAIMANTS' R  
15 HELD IN THE NAME OF "MCS" ) TO VERIFIED COMPLI  
16 and ) FORFEITURE IN  
17 \$39,188.38 IN U.S. CURRENCY SEIZED )  
18 FROM BANK OF SAIPAN ACCOUNT NO. )  
19 ENDING IN LAST FOUR DIGITS 2098, )  
20 HELD IN THE NAME OF "MCS," )  
21 ) Date:  
22 Defendants. ) Time:  
23 ) Judge:

The United States and Claimants Marianas Consultancy Services, LLC and Alfred Yue, by and through their undersigned counsel, hereby STIPULATE and REQUEST that the Court find good cause and extend the Fed. R. Civ. P. G(5)(b) deadline for Claimants' response to the Government's Verified Complaint for Forfeiture *In Rem* (the "Complaint") in the above-referenced matter.

Claimants timely filed their Claims to the Defendant Property on February 7, 2023 and, pursuant to Rule G(5)(b), Claimants had twenty-one days thereafter in which to file an Answer the Complaint. Due to the complexity of the allegations and the law applicable thereto, on February 23,

1 2023 the parties stipulated to extend the Rule G(5)(b) deadline by one-month to March 31, 2023  
2 (ECF No. 9) which Stipulation was granted (ECF No. 10).

3       Despite their diligent efforts, Claimants still need additional time to complete and file an  
4 appropriate response to the Complaint and submit that an additional one-week extension of the Rule  
5 G(5)(b) deadline is justified and reasonable under the circumstances. The Government does not  
6 object.

7        Accordingly, Claimants and the Government jointly request that the Court find good cause  
8 therefor and further extend the Rule G(5)(b) deadline in this case to Friday, April 7, 2023.

Respectfully Stipulated and Requested this 31<sup>st</sup> day of March, 2023.

12 || */s/ Eric S. O'Malley*

/s/ *Mark B. Hanson*

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